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8 *Attorneys for Plaintiffs*

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 RONEN HELMANN, CAMERON
12 HIGBY, and JUDIT MAULL,

13 Plaintiffs,

14 v.

15 CODEPINK WOMEN FOR PEACE, a
16 California entity, CODEPINK ACTION
17 FUND, a California entity, HONOR THE
18 EARTH, a Minnesota entity,
19 COURTNEY LENNA SCHIRF, and
20 REMO IBRAHIM, d/b/a PALESTINIAN
21 YOUTH MOVEMENT, and JOHN AND
JANE DOES 1-20,

22 Defendants.

Case No.: 2:24-cv-05704-SVW-PVC

**REQUEST FOR CLERK'S
DEFAULT**

23 Pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, RONEN
24 HELMANN, CAMERON HIGBY, and JUDIT MAULL ("Plaintiffs") hereby request
25 that the Clerk enter default against defendant CODEPINK WOMEN FOR PEACE
26 ("Code Pink"). In support of this request, Plaintiffs state the following:
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1. On July 7, 2024, Plaintiff RONEN HELLMAN filed a Complaint against Defendant Code Pink, alleging violations of the Freedom of Access to Clinic Entrances Act and the Klu Klux Klan Act. (Dkt. 1). On August 16, 2024, RONEN HELLMANN, CAMERON HIGBY, and JUDIT MAULL (“Plaintiffs”) filed their First Amended Complaint. (Dkt. 15).
2. On July 17, 2024, pursuant to Rule 4, counsel for Plaintiff sent a Notice of Lawsuit and Request to Waive Service (“Notice”) to Defendant CodePink at the address listed on the California Secretary of State website, 578 Washington Blvd., #395, Marina Del Rey, California 90292. Included in the envelope the Summons, Complaint, Notice, two copies of the Waiver of Service of Summons, and a self-addressed stamped envelope. *See* Declaration of Mark L. Javitch ¶ 5.
3. On or around August 17, 2024, in response to the Notice, counsel for Plaintiff received the executed waiver signed by Jodie Evans on August 12, 2024. Ms. Evans is Board President of CodePink. *Id* at ¶ 6; Dkt. 14.
4. On behalf of Code Pink, Ms. Evans agreed to respond to the Complaint under Federal Rule of Civil Procedure 12 within 60 days of the date it was sent, or by September 16, 2024. Dkt. 14.

1 5. As of the date of this filing, the deadline for Defendant Code Pink to respond
2 to the Complaint has passed, and Defendant Code Pink has yet to plead or
3 otherwise respond to this Court as required by Fed. R. Civ. P. 12.
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6 WHEREFORE, Plaintiffs respectfully request that the Clerk enter default against
7 Defendant Code Pink in accordance with Fed. R. Civ. P. 55(a).
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10 Dated: September 20, 2024 Respectfully Submitted,
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12 By: /s/ Mark L. Javitch
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